

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO, WESTERN DIVISION

AMY HAWKINS, Individually and as	)	CASE NO. 3:17-cv-386
Parent/Guardian of A.H., a minor	)	
and S.H., a minor,	)	JUDGE
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
STATE FARM MUTUAL AUTOMOBILE,	)	
INSURANCE COMPANY, et al.,	)	
	)	
Defendants.	)	

**NOTICE OF REMOVAL**

TO: THE JUDGES OF THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO, WESTERN DIVISION.

1. On January 23, 2017, an action was filed against Defendant, State Farm Mutual Automobile Insurance Company, in the Common Pleas Court of the State of Ohio, in and for Lucas County entitled Amy Hawkins, Individually and as Parent/Guardian of A.H., a minor and S.H., a minor v. State Farm Mutual Automobile Insurance Company, Case No. CI-0201701285, and said action was commenced by service of a copy of the Complaint and Summons upon Defendant on January 26, 2017, a copy of which is attached. Defendant has caused an Answer to be filed, a copy of which is attached hereto, although a time-stamped copy has not been received to date. No further proceedings have been had herein.

2. The above described action is a civil action of which this Court has original jurisdiction under the provisions of 28 U.S.C. § 1332 and is one which may be removed to this court by petitioner defendant herein, pursuant to the provisions of 28 U.S.C. § 1441, in that it is a civil action wherein the matter in controversy exceeds the sum or value of \$75,000.00, exclusive of

interest and costs and is between citizens of different states. The Plaintiff who is suing State Farm, at the time this action was commenced, was and still is a citizen of the State of Ohio; and the Defendant State Farm, at the time this action was commenced, was and still is a corporation incorporated under the laws of the State of Illinois, with its principal place of business in the State of Illinois and was not and is not a citizen of the State of Ohio wherein this action was brought.

3. Defendant desires to remove this action into this Court as provided in 28 U.S.C. § 1446(b) and does so within the 30-day requirement.

WHEREFORE, Defendant notifies all parties that the above action now pending in the Court of Common Pleas in the State of Ohio in and for Lucas County is removed to the United States District Court for the Northern District of Ohio, Western Division.

Respectfully submitted,

GALLAGHER, GAMS, PRYOR,  
TALLAN & LITTRELL L.L.P.

By: /s/ Mark H. Gams  
MARK H. GAMS (0025362)  
Trial Attorney for Defendant, State Farm  
Mutual Automobile Insurance Company  
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**CERTIFICATE OF SERVICE**

A copy of the foregoing has been served upon Samuel G. Bolotin, Attorney for Plaintiff, 3232 Executive Parkway, Toledo, Ohio 43606; by ordinary U.S. Mail service this 24<sup>th</sup> day of February, 2017.

By: /s/ Mark H. Gams  
MARK H. GAMS (0025362)  
Trial Attorney for Defendant, State Farm  
Mutual Automobile Insurance Company